

In the matter of the Proposed Rule Making (FCC 04-232)
As the operations manager of two AM stations in the Lebanon/ Albany, OR market
the proposed rulemaking to archive audio from our stations would be costly and
onerous.

We are constantly challenged in maintaining hard drive space in our digital
audio system. This would add an increased burden. Cost in addition to an
additional PC, sound cards, hard drives, network cabling would be the ongoing
labor to manage said archives.

One AM Facility (KSHO) is 100% network programmed via two networks (Jones and AP
Radio) with the exception of local news, public affairs, commercial
announcements, public service announcements and occasional live remote
broadcasts. Since a vast majority of the programming hours are either network
fed or pre-recorded said rulemaking to record KSHO's programming for the time
period 6 am - 10 pm daily, and retaining said recording for 90 days is unneeded.

Our second Facility, KGAL is programmed live approximately 14% of the time
during our daily news and local talk show segments. This includes time that is
network news, features, commercials, public affair programs, and public service
announcements. These are either pre-recorded or network feed. . Since a vast
majority of the programming hours are either network fed or pre-recorded said
rulemaking to record KGAL's programming for the time period 6 am - 10 pm daily,
and retaining said recording for 90 days is unneeded.

Furthermore, KGAL or KSHO has never received any public complaint concerning our
broadcasting of obscene material. In fact, KGAL and KSHO pride ourselves on
maintaining a tasteful, socially conservative approach to radio broadcasting and
adhere those standards.

The approach of mandatory audio archiving of all daytime/ evening programming
seems unreasonable considering the following:

- 1) The total number of broadcast stations
- 2) The total number of broadcast hours
- 3) The few number of stations broadcasting potential "obscene" material
- 4) The ratio of the actual number of complaints versus the total number of
station / broadcast hours
- 5) Many stations are utilizing national network programming

In summary we at Eads Broadcasting believe that these proposed changes to the
FCC Rules and Regulations should be denied.

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KGAL/KSHO
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